

Exhibit N



**Gary Franklin, California Supreme
Elite Youth Basketball**

V.

Nike USA, Inc., Nike, Inc., Nike EYB



For Review By

Michael Avenatti, Esq.

March 2019

“The corruption we observed in college basketball has its roots in youth basketball,” said former U.S. Secretary of State Condoleezza Rice, who chaired the NCAA’s Commission on College Basketball*



<https://www.nytimes.com/2018/04/25/sports/ncaa-condoleezza-rice.html>

*New York Times April 25, 2018

SNEAKER WARS
Big 3 Elite Youth Basketball Leagues
Owned & Operated by the Shoe Companies



**Nike Elite Youth
Basketball League**

<https://www.d1circuit.com>
<https://twitter.com/D1Circuit>

**ADIDAS
GAUNTLET**

**Adidas Gauntlet
Basketball League**

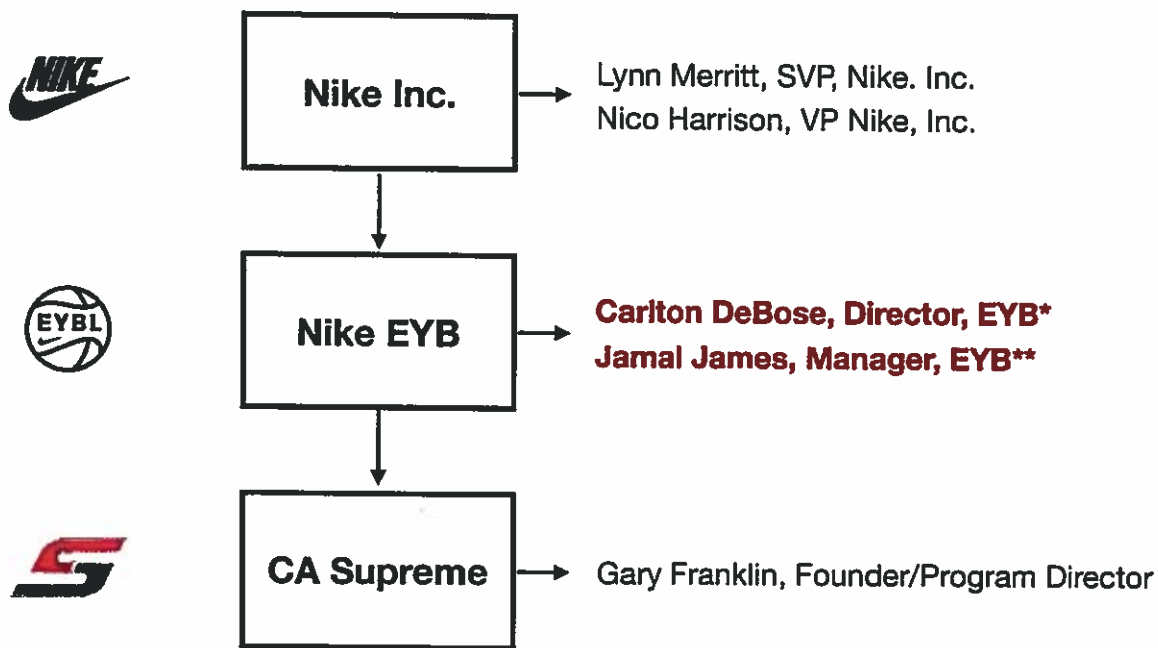
<https://adidasgauntlet.com>
<https://twitter.com/GauntletSeries>



**Under Armour
Association**

<http://uaa.io>
<https://twitter.com/uaassociation>

Nike / Nike EYB / CA Supreme Reporting Hierarchy



* Major Offender-2018, 2017
** Major Offender-2017

Question 1:

Is this a case of rogue executives Carlton DeBose & James James committing egregious criminal acts on their own, or was Nike, a fortune 100 company, complicit in the corruption?

Question 2:

Is Nike a company which tolerates workplace bullying and abuse by its senior executives?

Question 3:

Is Nike's enterprise, Nike EYB ("the Racket") guilty of racketeering, having committing acts of fraud, bribery, coercion, conspiracy, illegal cash payments, wire fraud, mail fraud, bank fraud, money laundering, etc.?





**Gary Franklin, California Supreme Elite Youth
Basketball**

v.

Nike USA, Inc., Nike, Inc., Nike EYB



CAST OF CHARACTERS

California Supreme Elite Youth Basketball (CA Supreme)

Gary Franklin
Founder & Program Director



Gary Franklin

Founder & Program Director, California Supreme
Elite Youth Basketball Program

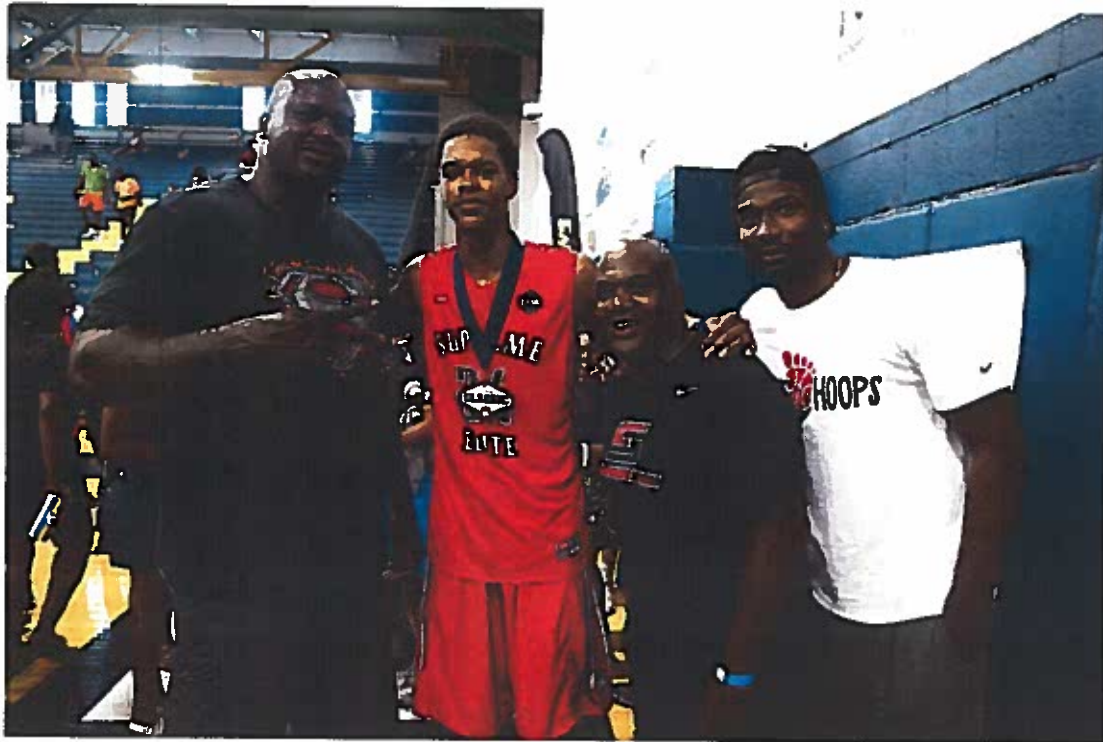
To Be Completed



CA Supreme Elite Youth Basketball Founder & Program Director
Gary Franklin and Nike Co-Founder Phil Knight



CALIFORNIA SUPREME YOUTH BASKETBALL OVER 100 COLLEGE SCHOLARSHIPS IN 10 YEARS



**Former NBA superstar Shaquille O'Neal, CA Supreme Alumni Shareef O'Neal (UCLA),
CA Supreme Founder & Program Director, Gary Franklin and Coach Deon Coleman**



Nike Elite Youth Basketball (EYB) Executives

Carlton DeBose*

Director of Nike's Elite Youth Basketball

Jamal James**

Manager of Nike's Elite Youth Basketball

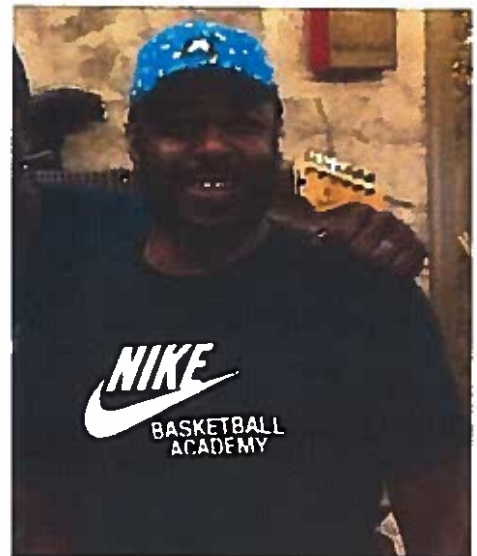


* Major Offender-2016, 2017
** Major Offender-2017

Carlton DeBose*

Director of Nike's Elite Youth Basketball

To Be Completed



Carlton DeBose, Director of Nike's Elite Youth Basketball

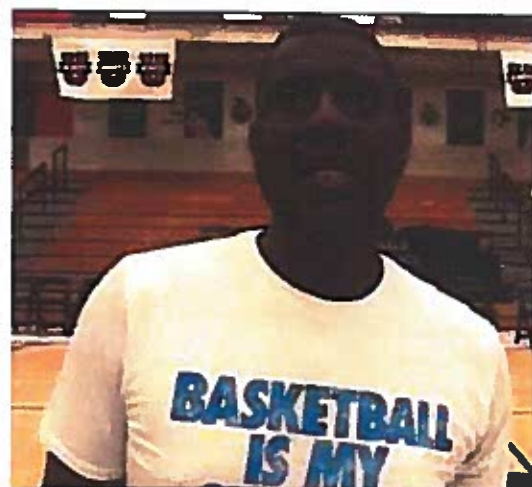


***Major Offender-2016, 2017**

Jamal James*

Manager of Nike's Elite Youth Basketball

To Be Completed



Jamal James, Manager of Nike's Elite Youth Basketball



***main offender**

Nike, Inc.
Executives
(oversight of Nike EYB)

Lynn Merritt
Senior Vice President of Global Basketball
Sports Marketing

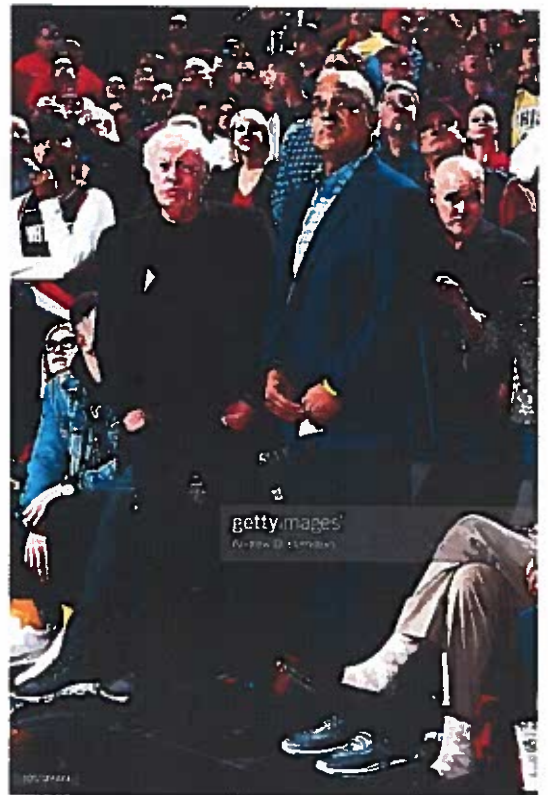
Nico Harrison
Vice President of North America
Basketball Operations



Lynn Merritt

Senior Vice President of Global Basketball
Sports Marketing

To Be Completed



Nike Co-founder and Chairman Emeritus Phil Knight and Nike Senior Vice President Global Basketball Sports Marketing Lynn Merritt



Nico Harrison

Vice President of North America Basketball
Operations

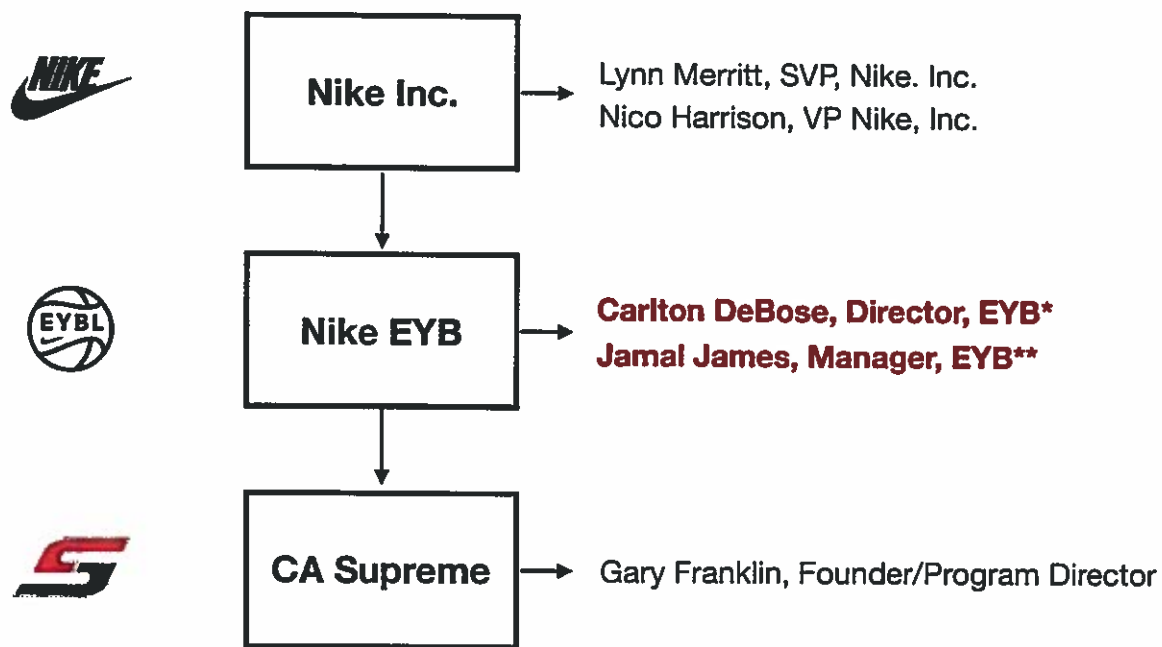
To Be Completed



Nico Harrison, Vice President of North America Basketball Operations



Nike / Nike EYB / CA Supreme Reporting Hierarchy



* Major Offender-2016, 2017
** Major Offender-2017

Nike EYB & CA Supreme 2016/2017 Elite 17U Players Involved

DeAndre Ayton (2016)

#1 Overall Pick 2018 NBA Draft by Phoenix Suns,
University of Arizona (1 yr.)

Bol Bol (2017)

Projected Top 10 Pick 2019 NBA Draft,
University of Oregon (1 yr.)

Brandon McCoy (2016)

Ranked #15 nationally Class of 2017 ESPN,
UNLV (4 yrs.)



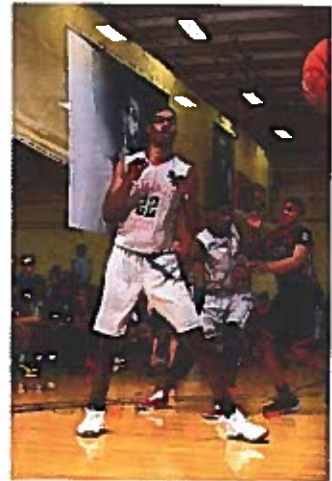
Nike EYB-CA Supreme 2016/2017 Elite 17U Players Involved



DeAndre Ayton
(2016)



Bol Bol
(2017)



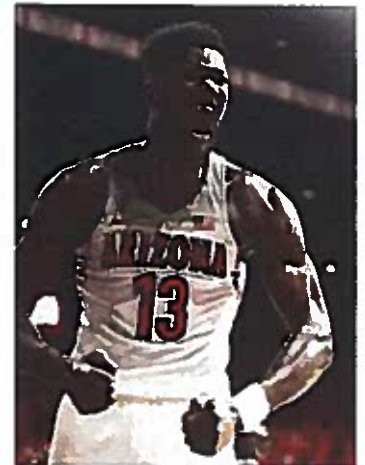
Brandon McCoy
(2016)



DeAndre Ayton

1st Overall Pick 2018 NBA Draft by the
Phoenix Suns. California Supreme Alumni.

To Be Completed



Bol Bol

Projected Top 15 Pick 2019 NBA Draft,
Former CA Supreme Elite Player (2017),
University of Oregon (1 yr.)

To Be Completed



Brandon McCoy

Projected Top 10 Pick 2019 NBA Draft,
University of Oregon (1 yr.)

To Be Completed



Handler, Trainer and Overzealous Father

Melvin “Mel” McDonald

DeAndre Ayton’s Handler (2016)

Bol Bol’s Handler (2017)

Shaun Manning

Elite Youth Basketball Trainer

Introduced Elite Player Brandon McCoy (2016) to Nike.

Bryan Freedman

Los Angeles Attorney, Father of Former CA

Supreme Elite Player Spencer Freedman,

Bol Bol’s Attorney

Melvin "Mel" McDonald

Handler to DeAndre Ayton (2016) and Bol Bol (2017)

To Be Completed



Melvin "Mel" McDonald, DeAndre Ayton and Bol Bol's Handler

Shaun Manning

Elite Youth Basketball Trainer for former CA Supreme
Elite 17U Player Brandon McCoy (2016)

To Be Completed



Elite Trainer, Shaun Manning with

Bryan J. Freedman

Los Angeles Attorney, father of former CA Supreme player, Spencer Freedman (2017).

Bryan Freedman is a pit-bull litigator and self-confessed bully, who'll do whatever it takes—to get what he wants, regardless of who gets hurt in the process. He'll make payoffs, threats, and abuse the legal system to intimidate, apply pressure or retaliate. Freedman has represented many high-profile entertainment clients such as Judge Judy and Megan Kelly.

Ever since Freedman's son, Spencer, was in middle school, Freedman was obsessed with his son playing for California Supreme's Elite Youth Basketball program (CA Supreme), a longstanding, top Nike Elite Youth Basketball program (Nike EYB).

In 2014, when Spencer Freedman was in 8th grade, Bryan Freedman approached Gary Franklin, CA Supreme's Founder & Program Director, and offered him \$30,000 for Spencer, an overachieving point guard, to start on Supreme's 16U Elite team, which featured a young, DeAndre Ayton, the future 1st overall NBA Draft pick in 2018. One of Freedman's conditions was that he (Freedman) had control of the 16U Elite team. Gary Franklin said no immediately, and rejected Freedman's offer. In 20+ years running Elite Youth Basketball programs, Gary Franklin never accepted (or considered accepting) money for any kid to play in his program. Also, Franklin had heard all about the utter chaos and destruction, Bryan Freedman usually left behind wherever Spencer played, and he wanted no part of Freedman. Freedman was not happy Franklin had rejected him and his (pay-to-play) offer.



Bryan Freedman, Los Angeles Attorney, Father of Spencer Freedman, CA Supreme 17U player (2017)

Bryan J. Freedman

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In 2015, the next year, Freedman approached Franklin again. He offered Franklin \$40,000 for Spencer, now a 9th grader, to start on CA Supreme's 16U elite team, with the condition Spencer's rec team coach would run the team. Franklin immediately rejected Freedman's offer again and Freedman was clearly not happy.

In 2016, the following year, with Spencer now a 10th grader, Freedman approached Franklin yet again, offering him \$50,000 for Spencer to start on Supreme's 17U elite team, which featured Nike elite players DeAndre Ayton and Brandon McCoy. For the 3rd time—in 3 years, Franklin rejected Freedman's offer. Freedman was frustrated and outraged by Franklin's refusal yet again.

Spencer Freedman attended Mater Dei High School, a Catholic high school in Orange County, known for excellent academics and athletics. In 2016, Bryan Freedman determined Mater Dei's Varsity basketball team (and Spencer) was in need of a "big man" to seriously compete, so Freedman retained the services of Melvin "Mel" McDonald, former Supreme player, DeAndre Ayton's "Handler" to help find and recruit a dominating "big man" to play alongside Spencer at Matre Dei during the upcoming 2017 season.

Mel McDonald found Bol Bol, son of former NBA star Manute Bol, a 7-foot H.S. sophomore in Kansas. Using DeAndre Ayton as a calling card, McDonald convinced Bol Bol's mother to transfer guardianship to McDonald (with Bryan Freedman's financial backing), so Bol Bol could move to Southern California, live with McDonald, and play at Mater Dei. McDonald, a successful recruiter of elite youth basketball players, also had serious question marks in his own past. In 2013, McDonald was arrested and charged with felony extortion and grand theft in Riverside County, CA.

Bryan J. Freedman

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In 2017, Bryan Freedman and Mel McDonald approached Nike Elite Youth Basketball execs Carlton DeBose (director) and Jamal James (manager), and leveraged their (supposed) interest from Adidas in Bol Bol playing on the elite Adidas Gauntlet circuit. Freedman told Nike, Adidas offered him and McDonald their own Gauntlet team for Bol Bol. Soon after, Nike's DeBose and James informed Franklin they wanted him to turn-over control of his highly-regarded 17U elite team to Freedman-McDonald for 2107 in order to keep Bol Bol away from Adidas. The plan included bringing Spencer Freedman's entire coaching staff from Mater Dei, which Bryan Freedman pa for. Freedman also agreed to pay at least \$75,000 to cover additional team expenses. This figure doesn't include any monies Freedman might've paid to McDonald, Bol Bol, Bol's family, or others who helped advance Freedman's cause.

In addition to leveraging Bol Bol with Nike to ensure his son, Spencer, a starting spot on a top 17U Elite Nike EYB team (alongside Bol Bol), Freedman used the Nike-Bol Bol situation to retaliate against Franklin for repeatedly rejecting Freedman's (pay-to-play) offers. Freedman personally waged revenge on Franklin, leveraging Nike EYB to take-away CA Supreme's elite 17U team from Franklin and turn it over to Freedman-McDonald for 2017. After gaining control of Franklin's his 17U elite team for the season, Freedman took every opportunity to further humiliate and abuse Franklin.

Bol Bol will enter the upcoming 2019 NBA Draft, and Bryan Freedman is now Bol's attorney.

Links to Some Related Articles:

Defendants Receive Lenient Sentences in College Basketball Corruption Case (3/5/2019)
<https://www.nytimes.com/2019/03/05/sports/college-basketball-scandal.html>

Three Found Guilty in N.C.A.A. Basketball Recruiting Scheme (10/24/2018)
<https://www.nytimes.com/2018/10/24/sports/ncaa-basketball-adidas-guilty.html>

N.C.A.A. Alters Rules for Agents and Draft in Wake of Basketball Corruption Scandal (8/8/2018)
<https://www.nytimes.com/2018/08/08/sports/ncaa-basketball-agents.html>

Investigation? N.C.A.A. Scrutiny? Business as Usual in Grassroots Hoops (5/21/2018)
<https://www.nytimes.com/2018/05/21/sports/investigation-ncaa-scrutiny-business-as-usual-in-grassroots-hoops.html>

N.C.A.A. Panel Proposes Reforms, Including End to 'One and Done' (4/25/2018)
<https://www.nytimes.com/2018/04/25/sports/ncaa-condoleezza-rice.html>

Report Ties Players at Top College Basketball Programs to Illicit Payments (2/23/2018)
<https://www.nytimes.com/2018/02/23/sports/ncaabasketball/ncaa-college-basketball.html>

Amid Scandal, N.C.A.A. Forms Commission to Reform Men's Basketball (10/11/2017)
<https://www.nytimes.com/2017/10/11/sports/ncaa-college-basketball-reform.html>